

¶ 168; see also Pennsylvania Order ¶ 120 (finding that Verizon's provision of unbundled switching satisfies the checklist); Massachusetts Order ¶ 222 (same); New York Order ¶¶ 346-348 (same); Connecticut Order ¶ 68 (same).<sup>43</sup>

Through October 2001, Verizon has provided approximately 22,000 unbundled local switching elements in New Jersey as part of network element platforms. See Lacouture/Ruesterholz Decl. ¶ 169. Verizon also has provided unbundled tandem switching in connection with each of these platform orders. See id. As with unbundled loops and transport, moreover, Verizon consistently provides unbundled switching on time. From August through October 2001, Verizon provided more than 99 percent of local switching elements in New Jersey by the due date. See id. ¶ 179.<sup>44</sup> Moreover, during this same period, the platforms that Verizon installed for CLECs in New Jersey experienced considerably fewer installation-related troubles than the retail comparison group. See id. ¶ 183.

As in its 271-approved States, Verizon also provides customized routing (using line-class codes) so that CLECs can route directory assistance and operator services traffic to their own platforms, to a third-party platform, or to Verizon's platform. See id. ¶ 170. As in its previously approved States, Verizon offers a standardized local switching configuration that gives CLECs

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<sup>43</sup> Verizon makes unbundled switching available pursuant to legally binding interconnection agreements and tariffs. See Lacouture/Ruesterholz Decl. ¶ 168. Unbundled local switching is available as a line side or a trunk side port (shared and dedicated) and includes the vertical features available to Verizon's retail customers on a line-by-line basis. See id. In addition, Verizon provides CLECs with access to other features resident in its switches that Verizon does not offer its retail customers. See id.

<sup>44</sup> As with the other average completed interval measurements discussed above, the CLECs and the New York PSC have agreed to eliminate the average completed interval measurement for unbundled switching and platforms. See Lacouture/Ruesterholz Decl. ¶ 180. Accordingly, the Commission should not consider this measurement here. In any event, Verizon's performance under this measurement is excellent. From August through October, Verizon's average interval for switching/platform orders that did not require a dispatch was 1.5 days, compared to 2.5 days for the retail comparison group. See id. ¶ 182.

the same local call routing as Verizon itself, but with the option of branding their directory-assistance and operator-services traffic as they choose. See id. ¶ 171. Finally, as in its 271-approved States, Verizon is capturing and providing usage data to CLECs that enable them to bill for exchange access. See id. ¶ 174.

### **3. Unbundled Local Transport (Including Interoffice Facilities).**

Verizon provides unbundled dedicated and shared transport in New Jersey using substantially the same processes and procedures that it uses in its 271-approved States. See id. ¶ 188; see also Pennsylvania Order ¶¶ 109-113 (finding that Verizon's provision of shared and dedicated transport satisfies the checklist); Massachusetts Order ¶¶ 208-212 (same); New York Order ¶¶ 338-342 (same); Connecticut Order ¶¶ 62-66 (same).<sup>45</sup>

Through October 2001, Verizon has provided shared transport on each of the approximately 22,000 platforms it has provided. See Lacouture/Ruesterholz Decl. ¶ 197. Moreover, because shared transport is provided as part of network element platforms, it has been delivered at the same time as the accompanying loops and unbundled switching. As discussed above, Verizon provides platforms on time more than 99 percent of the time in New Jersey, and the same is true of unbundled shared transport. See id. ¶ 179.

Verizon also has provided dedicated local transport facilities to competing carriers in New Jersey; however, the volume of such orders has been very small. See id. ¶¶ 190-191. From August through October, Verizon received, on average, fewer than ten orders for unbundled dedicated transport each month. See id. ¶ 191. Verizon did not miss any of its appointments for installing CLECs' dedicated transport during this three-month period. See id.

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<sup>45</sup> Verizon provides shared and dedicated transport under interconnection agreements. See Lacouture/Ruesterholz Decl. ¶ 188. This includes shared transport between Verizon's end office switches, between end office and tandem switches, and between tandem switches. See id. ¶ 189.

#### 4. Dark Fiber.

Verizon provides “dark fiber” — that is, fiber that has not been activated through the connection of the electronics used to carry communications services — in New Jersey. See id. ¶ 199; UNE Remand Order ¶ 165.<sup>46</sup> From January through October 2001, Verizon received 13 dark fiber orders from CLECs in New Jersey, and provisioned all of these orders on time. See Lacouture/Ruesterholz Decl. ¶ 205. Verizon’s current dark fiber offering in New Jersey, as well as the processes and procedures used to provide dark fiber, are substantially the same as those used in Pennsylvania and Connecticut, which the Commission found satisfy the Act. See id. ¶ 199; Pennsylvania Order ¶¶ 109-113; Connecticut Order ¶¶ 49-54.

#### 5. Combining Unbundled Network Elements.

As in its 271-approved States, Verizon provides both existing combinations of network elements and access to unbundled elements that allows competing carriers to assemble combinations of elements themselves. See Lacouture/Ruesterholz Decl. ¶ 207; see also Pennsylvania Order ¶¶ 73-75 (finding that Verizon’s provision of UNE combinations satisfies the checklist); Massachusetts Order ¶¶ 117-120 (same); New York Order ¶¶ 229-236 (same); Connecticut Order ¶ 52 (same).

*First*, Verizon provides the same preassembled combinations of elements that it provides in its 271-approved States. See Lacouture/Ruesterholz Decl. ¶¶ 210-214.<sup>47</sup> As noted above,

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<sup>46</sup> Under the terms of its interconnection agreements, Verizon provides both dark fiber interoffice facilities and dark fiber loops, where spare facilities are available. See Lacouture/Ruesterholz Decl. ¶¶ 199, 201.

<sup>47</sup> During the course of the State proceedings, only one CLEC (ATX) complained about Verizon’s provision of UNE combinations. In particular, ATX complained that Verizon did not make available certain switch-based features as part of UNE platforms. But Verizon now provides those features. As ATX now admits, moreover, Verizon never objected to ATX’s request for those features and committed to the New Jersey BPU to provide them. See Consultative Report Application of Verizon-New Jersey Inc. for FCC Authorization To Provide

Verizon has provided competing carriers in New Jersey with approximately 22,000 complete, preassembled platforms of network elements through October of this year. See Lacouture/Ruesterholz Decl. ¶ 212. Verizon also provides a “switch sub-platform” (local switching in combination with other shared network elements such as shared transport, shared tandem switching, and SS7 signaling), although no competitor has yet requested this combination. See id. ¶ 213. Moreover, Verizon provides loop and transport combinations in accordance with the Commission’s rules. See id. ¶ 214; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Supplemental Order, 15 FCC Rcd 1760 (1999); Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Supplemental Order Clarification, 15 FCC Rcd 9587 (2000). From August through October, Verizon provisioned only 90 loop/transport combinations to CLECs in New Jersey, and Verizon’s missed appointment rate was lower for CLECs (6.59 percent) than for the retail comparison group (10.30 percent). See Lacouture/Ruesterholz Decl. ¶ 216.

*Second*, Verizon offers CLECs in New Jersey the same methods of access to combine unbundled network elements as in Verizon’s 271-approved States. See id. ¶¶ 207-209. For example, Verizon offers competing carriers a variety of forms of access that permit them to combine network elements, including physical, virtual, and various forms of cageless collocation. See id.

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In-Region, InterLATA Services in New Jersey, Initial Brief of ATX Licensing, Inc., Docket No. TO01090541, at 6-7 (NJ BPU filed Dec. 7, 2001) (noting that Verizon “made no claim that it was not required to provide this as a UNE-P offering,” and instead “sought to demonstrate compliance with this requirement by claiming that the service would be available as of October 31, 2001.”); see also Lacouture/Ruesterholz Decl. ¶ 217.

**C. Poles, Ducts, Conduits, and Rights-of-Way (Checklist Item 3).**

Verizon provides nondiscriminatory access to poles, ducts, conduits, and rights-of-way that it owns or controls in New Jersey. Through October 2001, Verizon has provided more than one million pole attachments and approximately 1.8 million feet of conduit in New Jersey. See id. ¶ 218.

Verizon provides access to poles, ducts, and conduits on a timely basis. For example, Verizon is committed to completing field surveys and responding to pole and conduit requests within 45 days, and did so 100 percent of the time from August through October. See id. ¶ 226. Moreover, from January through October, Verizon was able to satisfy a competing carrier's request for poles and conduits without make-ready work at least 60 percent of the time. See id. ¶ 230. In such cases, Verizon provides access immediately upon issuance of a license. See id. In other cases, make-ready or construction work may be needed. From May through October, Verizon completed the make-ready work for CLECs' pole attachments and conduit occupancy in New Jersey more quickly than it performed such work for itself. See id. ¶ 231.

**D. 911, E911, Directory Assistance, and Operator Call-Completion Services (Checklist Item 7).**

911 and E911. Verizon provides competing carriers in New Jersey with nondiscriminatory access to E911 services and databases pursuant to contract. See id. ¶¶ 233-234. Through October 2001, CLECs with their own switches have obtained approximately 361,000 E911 subscriber listings in New Jersey. See id. ¶ 248.

As in Verizon's 271-approved States, CLECs that have their own switches make their own entries in the E911 database using an electronic interface that gives them the same ability as Verizon to input information. See id. ¶¶ 246-247. In addition, through October 2001, Verizon has provided more than 1,600 E911 trunks to 25 CLECs in order to establish connections to

Verizon's E911 tandems. See id. ¶ 240. Verizon provides competing carriers with E911 trunks on a timely basis, within the same standard intervals as for interconnection trunks generally. See id. ¶ 239.

Moreover, for a competing carrier without its own switch, Verizon will enter all the necessary E911 data for that carrier's customers in exactly the same way that Verizon enters its own customer data. See id. ¶ 243. Verizon also commingles CLECs' E911 database entries with Verizon's own entries to ensure that they are maintained with the same accuracy and reliability that Verizon maintains for its own retail customers. See id.

Directory Assistance. Verizon provides directory assistance services in New Jersey in substantially the same way that it does in its 271-approved States. See id. ¶ 249; see also Pennsylvania Order ¶ 120 (finding that Verizon's provision of directory assistance satisfies the Act); Massachusetts Order ¶ 222 (same); New York Order ¶¶ 351-356 (same); Connecticut Order ¶ 68 (same). Competing carriers have the option of purchasing directory assistance directly from Verizon, or they can rely on their own directory assistance centers and use Verizon's or a third party's directory assistance database. See Lacouture/Ruesterholz Decl. ¶ 250.<sup>48</sup>

As of October 2001, nine carriers were purchasing directory assistance services from Verizon using approximately 1,400 dedicated OS/DA trunks, and another 101 competing carriers were purchasing directory assistance service using shared transport. See id. ¶ 251. Verizon provides trunks to competing carriers for directory assistance in the same manner it provides

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<sup>48</sup> For CLECs that establish their own directory assistance centers, Verizon provides nondiscriminatory access to its directory assistance listings. See Lacouture/Ruesterholz Decl. ¶ 255. Verizon allows CLECs to use Direct Access to Directory Assistance, a database service that provides read-only access to Verizon's directory assistance listings. See id. Verizon also makes the contents of its directory assistance database available to CLECs in an electronic format for their use in providing local directory assistance services. See id. ¶ 256.

interconnection trunks generally. See id. Moreover, when CLECs purchase Verizon's directory assistance services, they have their choice of branding options,<sup>49</sup> and calls from CLEC customers are handled in a nondiscriminatory fashion and answered as quickly as calls from Verizon's own customers. See Lacouture/Ruesterholz Decl. ¶ 258.

Operator Services. Verizon likewise provides access to its operator services in New Jersey using the same checklist-compliant processes and procedures that it uses in its 271-approved States. See id. ¶ 259; see also Pennsylvania Order ¶ 120 (finding that Verizon's provision of operator services satisfies the checklist); Massachusetts Order ¶ 222 (same); New York Order ¶¶ 354-356 (same); Connecticut Order ¶ 68 (same). Competing carriers again have the option either to purchase operator services from Verizon or to rely on their own centers. See Lacouture/Ruesterholz Decl. ¶ 260.

As of October 2001, eight facilities-based CLECs were purchasing operator services from Verizon using approximately 1,400 dedicated OS/DA trunks. See id. ¶ 262. Another 101 competing carriers were purchasing operator services using shared transport. See id. As with directory assistance, Verizon provides trunks to competing carriers that provide their own operator services in the same time and manner and in the same intervals as it provides interconnection trunks generally. See id. Moreover, when CLECs purchase Verizon's operator services, they have their choice of branding options, and Verizon's performance in handling calls from CLEC customers in a timely manner is even better than the standards established in the BPU-approved Carrier-to-Carrier guidelines. See id. ¶¶ 264-266.

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<sup>49</sup> Verizon permits CLECs that purchase Verizon's directory assistance services to order such services "unbranded," "rebranded," or with a Verizon brand. See Lacouture/Ruesterholz Decl. ¶ 254.

**E. White Pages Directory Listings (Checklist Item 8).**

Verizon provides access to its white pages directory listings in New Jersey in substantially the same manner as it does in its 271-approved States. See id. ¶ 267; see also Pennsylvania Order ¶¶ 114-117 (finding that Verizon's provision of white pages directory listings satisfies the checklist); Massachusetts Order ¶ 222 (same); New York Order ¶¶ 357-361 (same); Connecticut Order ¶¶ 60-61 (same). KPMG has reviewed Verizon's provision of directory listings, and found that Verizon provides accurate listings to CLECs. See Lacouture/Ruesterholz Decl. ¶ 284; KPMG NJ Report at 229.

Competing carriers in New Jersey use Verizon's white pages directory listings extensively: through October 2001, Verizon had provided competing carriers in New Jersey with more than 122,000 basic white pages directory listings, including approximately 55,000 for residential customers. See Lacouture/Ruesterholz Decl. ¶ 278.<sup>50</sup> Moreover, Verizon has procedures in place to ensure that the directory listings of CLEC customers are included in Verizon's database on an accurate, reliable, and nondiscriminatory basis. See id. ¶¶ 279-283.<sup>51</sup> In fact, Verizon provides CLECs with several means of verifying their customers' listings prior to publication. See id. ¶¶ 280-283. These include a listings verification report that Verizon provides 30 days prior to the service order close date, see id. ¶ 280; the ability to review published listings in real time through a Web GUI, see id. ¶ 282; and an electronic confirmation of the information entered on a CLEC's listing service request, see id. ¶ 281.

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<sup>50</sup> Verizon provides white pages directory listings under interconnection agreements. See Lacouture/Ruesterholz Decl. ¶ 269.

<sup>51</sup> For example, Verizon commingles the listings of CLECs' customers alphabetically with Verizon's own customers, using the same type face and format and with no distinguishing features. See Lacouture/Ruesterholz Decl. ¶ 270. Verizon enters CLECs' listings using the same procedures as for its own listings. See id. ¶ 271.



**F. Number Administration (Checklist Item 9).**

Verizon is no longer responsible for assigning telephone numbers either to itself or to competing carriers in New Jersey: NeuStar has assumed responsibility as the North American Numbering Plan Administrator. See id. ¶ 286. Through October 2001, approximately 13 million telephone numbers have been assigned to CLECs in New Jersey. See id. Verizon ensures accurate and complete programming of NXX codes in its switches in New Jersey. See id. ¶ 287. For example, Verizon installs new NXX codes for CLECs in accordance with the procedures in the Central Office Code Assignment Guidelines. See id. ¶ 288. Verizon also conducts a monthly comparison of the information in its own internal Code Administration System with the information in the Local Exchange Routing Guide to ensure that Verizon's information is accurate. See id. ¶ 289.

**G. Databases and Associated Signaling (Checklist Item 10).**

Verizon provides competing carriers in New Jersey with access to its databases and signaling using substantially the same nondiscriminatory processes and procedures that it uses in its 271-approved States. See id. ¶ 290; see also Pennsylvania Order ¶ 120 (finding that Verizon's provision of databases and signaling satisfies the checklist); Massachusetts Order ¶ 222 (same); New York Order ¶ 366 (same); Connecticut Order ¶ 68 (same).<sup>52</sup>

Through October 2001, Verizon was providing seven CLECs with access to its SS7 signaling network. See Lacouture/Ruesterholz Decl. ¶ 294. Verizon also provides CLECs with

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<sup>52</sup> Verizon provides access to signaling and databases under interconnection agreements. See Lacouture/Ruesterholz Decl. ¶¶ 291, 297, 300, 305, 309. With respect to signaling, Verizon uses the same facilities, equipment, and personnel to provision signaling links for CLECs and itself. See id. ¶ 296. And all signaling traffic on Verizon's network is queued and routed on a nondiscriminatory basis. See id. With respect to databases, Verizon adds information for CLEC customers to its databases in the same manner as for Verizon's own customers, and CLEC queries to the databases are commingled with Verizon's own queries and processed on a first-come, first-served basis. See id. ¶¶ 303-304, 307-308, 311.

access to its Toll Free, Line Information, and Calling Name databases. See id. ¶¶ 297, 300, 305. In the first ten months of this year, Verizon processed more than 1.8 billion queries for its Toll Free database in New Jersey, see id. ¶ 298; more than 131 million queries for its Line Information database in the former Bell Atlantic South States (New Jersey, Pennsylvania, Maryland, Virginia, West Virginia, Delaware, and the District of Columbia), see id. ¶ 302; and more than 647 million queries for its Calling Name database in New Jersey, see id. ¶ 306. In addition, three CLECs and interexchange carriers in New Jersey have made the necessary arrangements to access Verizon's Local Number Portability database. See id. ¶ 310.

As in Verizon's 271-approved States, Verizon also provides competing carriers with access to its Service Management System database, which enables competitors to enter, modify, or delete entries in Verizon's call-related databases. See id. ¶ 312. In addition, CLECs may obtain access to Verizon's Service Management System/Service Creation Environment, which enables them to create and test their own Advanced Intelligent Network ("AIN")-based telecommunications services. See id. ¶ 313.

#### **H. Number Portability (Checklist Item 11).**

Verizon has implemented long-term number portability ("LNP") in all of its end offices in New Jersey. See id. ¶ 317. Verizon uses substantially the same processes and procedures to provide number portability in New Jersey as it uses in its 271-approved States. See id. ¶ 316; see also Pennsylvania Order ¶ 120 (finding that Verizon's provision of number portability satisfies the checklist); Massachusetts Order ¶ 222 (same); New York Order ¶¶ 369-371 (same); Connecticut Order ¶ 68 (same).<sup>53</sup> Through October 2001, Verizon provided 20 CLECs with

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<sup>53</sup> Verizon provides LNP under interconnection agreements. See Lacouture/Ruesterholz Decl. ¶ 316. Verizon also continues to maintain interim number portability ("INP") capabilities for CLECs, though it is no longer taking orders for INP. See id. ¶ 317. Where CLECs have existing INP arrangements, Verizon is converting those arrangements to LNP on a mutually

LNP on approximately 298,000 telephone numbers. See Lacouture/Ruesterholz Decl. ¶ 318.

From August through October, Verizon met the due date on more than 97 percent of the orders for LNP associated with a hot-cut, and more than 94 percent of the stand-alone number portability orders. See id. ¶¶ 319-320.

**I. Local Dialing Parity (Checklist Item 12).**

Verizon provides local dialing parity throughout its service area in New Jersey using substantially the same processes and procedures as in its 271-approved States. See id. ¶ 321. Once local calls from competing carriers reach Verizon's network, they are treated the same as any call that originates on Verizon's own network. See id. ¶ 322. Accordingly, no differences exist in dialing delays, call completion, or transmission quality between calls made by CLECs' customers and calls made by Verizon's customers. See id. From August through October 2001, Verizon exchanged approximately 19 billion minutes of traffic over local interconnection trunks on calls that were completed with dialing parity. See id. ¶ 325. In addition, while intraLATA toll dialing parity is not a checklist requirement, Verizon has implemented intraLATA toll dialing parity in New Jersey pursuant to the New Jersey BPU's requirements. See id. ¶ 326.

**J. Reciprocal Compensation (Checklist Item 13).**

Verizon is providing reciprocal compensation for transportation and termination of local calls to competing carriers in New Jersey. See id. ¶ 327. As of October 2001, Verizon was paying reciprocal compensation to some 14 CLECs, six mobile wireless providers, and nine paging companies. See id. ¶ 329.<sup>54</sup>

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agreed-upon schedule. See id. Through October 2001, Verizon continues to provide INP on approximately 150 telephone numbers. See id.

<sup>54</sup> The Commission has found that intercarrier compensation for Internet-bound traffic is not subject to 47 U.S.C. § 251(b)(5), which means that compensation for such traffic is not an issue under the checklist. See Implementation of the Local Competition Provisions in the

**K. Resale (Checklist Item 14).**

Verizon makes available for resale at wholesale rates established by the New Jersey BPU all of the telecommunications services that it offers at retail to subscribers that are not telecommunications carriers. See Lacouture/Ruesterholz Decl. ¶ 331.<sup>55</sup> Verizon makes services available for resale in substantially the same manner and using the same processes and procedures as in Verizon's 271-approved States. See id.; see also Pennsylvania Order ¶¶ 93-95 (finding that Verizon's provision of resale satisfies the checklist); Massachusetts Order ¶¶ 217-221 (same); New York Order ¶¶ 381-399 (same); Connecticut Order ¶¶ 9, 27-44, 55 (same). Through October 2001, Verizon has provided approximately 182,000 resold lines to CLECs in New Jersey, including approximately 127,000 business lines and approximately 55,000 residential lines. See Lacouture/Ruesterholz Decl. ¶ 333.

Verizon provides services for resale on time, when CLECs request them. From August through October 2001, Verizon met more than 99 percent of its installation appointments for CLECs that did not require the dispatch of a Verizon technician and approximately 95 percent of the installation appointments that did require a dispatch. See id. ¶¶ 340-341.<sup>56</sup> Moreover,

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Telecommunications Act of 1996; Intercarrier Compensation for ISP-Bound Traffic, Order on Remand and Report and Order, 16 FCC Rcd 9151 (2001); 47 U.S.C. § 271(c)(2)(B)(xiii); id. § 252(d)(2); Pennsylvania Order ¶ 119; Connecticut Order ¶ 67; Massachusetts Order ¶ 215; Kansas/Oklahoma Order ¶ 251.

<sup>55</sup> Verizon is making available services for resale under interconnection agreements and tariffs. See Lacouture/Ruesterholz Decl. ¶ 331. The BPU established the following wholesale discounts: 17.04 percent for lines with Verizon's Operator Services and Directory Assistance, and 20.30 percent for lines without these features. See id. ¶ 332.

<sup>56</sup> As with the other average completed interval measurements discussed above, the CLECs and the New York PSC have agreed to eliminate the average completed interval measurement for resold services. See Lacouture/Ruesterholz Decl. ¶ 342. Accordingly, the Commission should not consider this measurement here. In any event, Verizon's performance under this measurement is at parity. From August through October, Verizon's average interval for CLEC business resale orders that did not require a dispatch was 1.45 days, compared to 2.57 days for the retail comparison group. See id. ¶ 343. During that same period, Verizon's average

Verizon's performance for CLECs has consistently been equal to or better than Verizon's performance for the retail comparison group. See id. Likewise, Verizon's installation quality on resold lines is comparable to the performance that Verizon provides for retail customers. See id. ¶ 344. And on the very small percentage of resold lines that experience troubles, Verizon repairs them in a timely and nondiscriminatory manner. See id. ¶¶ 348-351.

Resellers in New Jersey may resell any of Verizon's customer-specific pricing arrangements ("CSPs") to any customer (or customers) that meet the terms and conditions of that particular arrangement. See Lacouture/Ruesterholz Decl. ¶ 334. While a customer that elects to terminate its service with Verizon may be subject to reasonable and nondiscriminatory termination liabilities to the extent they were part of the original terms of the CSP agreed to by the customer, the Commission has held that this is not "unreasonable or discriminatory." New York Order ¶ 390; see Lacouture/Ruesterholz Decl. ¶ 336.

Finally, Verizon offers for resale at a wholesale discount those DSL services that are subject to a discount under the Commission's rules. See Lacouture/Ruesterholz Decl. ¶ 352. As noted above, unlike in Verizon's 271-approved States, in New Jersey Verizon has historically provided DSL services directly through the telephone company, rather than through a separate affiliate, since the BPU never acted on Verizon's request to transfer its assets to the separate affiliate. See id. Verizon is currently transitioning its advanced services operations to a separate division. See id. ¶ 354. Nonetheless, Verizon provides competing carriers with the ability to resell Verizon's retail DSL services over Verizon resold lines in New Jersey just as it does in its 271-approved States. See id. ¶ 353. From August through October, CLECs in New Jersey have submitted only 36 orders to resell Verizon's retail DSL service. See Lacouture/Ruesterholz

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interval for CLEC residential resale orders that did not require a dispatch was 1.45 days, compared to 1.21 days for the retail comparison group. See id.

Decl. ¶ 355. Although these order volumes are too low to provide meaningful results, Verizon's performance on these small numbers of orders has been excellent, completing all of them on time. See id.

**L. Operations Support Systems.**

Verizon provides CLECs in New Jersey with access to the various items on the checklist through operations support systems that are in place, operational, fully tested, and already handling large commercial volumes.

As an initial matter, Verizon provides CLECs operating in New Jersey with access to the various checklist items through identical common interfaces to its OSS as those serving Verizon's 271-approved States and the rest of the former Bell Atlantic service area. See McLean/Wierzbicki/Webster Decl. ¶ 8; see also Pennsylvania Order ¶¶ 11-12 (finding that Verizon's OSS and interfaces satisfy the checklist); Massachusetts Order ¶¶ 50, 70, 90, 95, 97, 102, 114 (same) ; New York Order ¶ 82 (same); Connecticut Order ¶ 51 (same). Verizon also provides CLECs in New Jersey with the same level of support as it does in its 271-approved States, including through the change management process and the carrier-to-carrier testing procedures, as well as through the documentation, the training, and the help desk that are provided to CLECs. See McLean/Wierzbicki/Webster Decl. ¶ 9.

As was the case in Verizon's previously approved applications, Verizon's systems in New Jersey are handling large commercial volumes. For example, Verizon's pre-ordering systems handled an average of nearly 2.4 million transactions per month across the former Bell Atlantic footprint in the first ten months of this year, including an average of approximately 130,000 transactions per month in New Jersey. See McLean/Wierzbicki/Webster Decl. ¶ 42. Verizon's ordering systems and interfaces processed more than 8.6 million orders in the first ten months of this year across the former Bell Atlantic footprint. See McLean/Wierzbicki/Webster

Decl. ¶ 60. During that same period, the service order processor in New Jersey — which handles orders only for that one state — handled approximately 413,000 orders. See id.

As in Verizon's 271-approved States, Verizon's New Jersey systems also have been subject to "rigorous, comprehensive third party testing" by KPMG that provides "persuasive evidence of Verizon's OSS readiness." Massachusetts Order ¶¶ 44-46; see also Pennsylvania Order ¶ 49-50; New York Order ¶ 100. The KPMG test, which was conducted under the supervision of the New Jersey BPU, evaluated 372 different test points related to Verizon's OSS, and Verizon satisfied all 372 — a perfect score. See McLean/Wierzbicki/Webster Decl. ¶ 23. Based on these results, even WorldCom was forced to concede before the BPU that "KPMG did an excellent job on the OSS test in this state. In fact, one of the best." November 5, 2001 Transcript at 38.

Finally, Verizon has continued to update its systems since its previous applications. For example, while Verizon continues to offer CLECs in New Jersey one of the versions of the application-to-application pre-ordering and ordering interfaces that it offered in Massachusetts and Pennsylvania when its applications for those States were approved, it now offers CLECs in both states the option of using updated versions of those interfaces that are based on newer versions of industry standards. See McLean/Wierzbicki/Webster Decl. ¶¶ 29, 55. Moreover, as described below, Verizon has implemented new capabilities in its systems, including a long-term mechanism for CLECs to obtain electronic access to the limited loop make-up information available in Verizon's Loop Facility Assignment and Control System ("LFACS") and additional capabilities for ordering line splitting.

# **1. Pre-Ordering.**

Verizon provides CLECs in New Jersey with the same three electronic pre-ordering interfaces that it does in its 271-approved States and throughout the former Bell Atlantic service

areas. See McLean/Wierzbicki/Webster Decl. ¶ 27. The first is a Web-based Graphical User Interface (“Web GUI”) that can be used with a personal computer. See id. ¶ 36. The second is an application-to-application interface based on the industry standard Electronic Data Interchange (“EDI”) protocol. See id. ¶ 28. Verizon currently offers two industry-standard versions of the Local Service Ordering Guidelines (“LSOG”) for each of the pre-ordering interfaces: LSOG 4 and LSOG 5. LSOG 4 was in place in Massachusetts, Connecticut, and Pennsylvania when the Commission approved Verizon’s applications for those states; LSOG 5 is the latest adopted version of these standards and guidelines. See id. ¶¶ 28-32.<sup>57</sup> The third is another application-to-application interface known as Common Object Request Broker Architecture (“CORBA”). See id. ¶ 33. CLECs are using all three interfaces to submit pre-ordering transactions in New Jersey. See id. ¶ 27.<sup>58</sup>

Verizon’s pre-ordering interfaces already handle substantial commercial volumes. For example, in 2000, Verizon processed more than 13.1 million pre-ordering transactions across the former Bell Atlantic footprint. See McLean/Wierzbicki/Webster Decl. ¶ 42. Verizon processed an even greater number of transactions in just the first six months of 2001 alone, and in the first

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<sup>57</sup> As with prior versions, Verizon implemented this new standard pursuant to the Change Management Process originally developed in New York and now applied throughout the former Bell Atlantic region. This process incorporated input from CLECs and enabled them to test the release before it was implemented in production. See McLean/Wierzbicki/Webster Decl. ¶¶ 30-32. Because Verizon supports two versions of a pre-ordering interface, as specified in the Change Management Process, CLECs can make the transition to new versions on a schedule that is convenient for them. See id. ¶ 32. Verizon has retired LSOG 3/EDI 9 (earlier versions of these industry guidelines) using the phased cut-over approach, which allows transactions in the “old” format to be submitted up to 30 days after implementation of the “new” format. With the elapse of that 30 days, CLECs using the retired version of EDI have had 20 months since the March 2000 introduction of LSOG 4/EDI 10 to migrate to a newer version of the interface. See id. ¶¶ 31-32.

<sup>58</sup> CLECs can integrate Verizon’s pre-ordering EDI and CORBA interfaces with their own back-end systems and with Verizon’s EDI ordering interface. See McLean/Wierzbicki/Webster Decl. ¶ 35; Massachusetts Order ¶ 52; New York Order ¶¶ 137-138.



ten months of this year Verizon processed more than 24 million pre-ordering transactions, including more than 1.3 million in New Jersey. See id.

Moreover, even at these large and increasing volumes, the performance of Verizon's pre-ordering systems is excellent. For example, from August through October 2001, Verizon's EDI and CORBA interfaces were available more than 99.5 percent of the time they were scheduled to be available. See id. ¶ 39. The Web GUI was available more than 99.5 percent of the time it was scheduled to be available in August and more than 99.4 percent of the time it was scheduled to be available in October. See id. ¶¶ 40-41; Massachusetts Order ¶ 53 & n.154 (relying on comparable performance); New York Order ¶ 156 (same).<sup>59</sup> Moreover, Verizon has continued to meet the response-time standards for virtually every type of pre-ordering transactions, including the standards for EDI, CORBA, and Web-GUI transactions, as well as the separate standard for providing so-called "parsed" Customer Service Records. See McLean/Wierzbicki/Webster Decl. ¶¶ 24, 43; Massachusetts Order ¶ 53 & n.155 (relying on comparable performance); New York Order ¶¶ 146-148 (same).<sup>60</sup>

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<sup>59</sup> In September, Verizon's Web GUI fell slightly below the standard — to approximately 97.5-percent availability — due to corrective actions taken by Verizon to address slow response conditions and outages resulting from inappropriate use of the Web GUI by certain CLECs. See McLean/Wierzbicki/Webster Decl. ¶ 40. In particular, a number of CLECs were using Verizon's Web GUI database to store their old transactions — as many as six million at one point — rather than deleting them after a transaction was complete, and despite requests from Verizon that they do so. See id. To alleviate the slow response conditions and outages resulting from these excess transactions in Verizon's systems, Verizon purged its systems of old transactions, after first giving CLECs nearly three weeks' notice; however, the process of performing this purge also made Verizon's interface unavailable for an additional period of time. See id. ¶ 41.

<sup>60</sup> As was the case in Pennsylvania, the only reported results that show a slight difference between wholesale and retail are for Telephone Number Availability & Reservation. This is a function of the fact that the New Jersey measurement — like the Pennsylvania measurement — compares the time it takes to perform two separate activities for CLECs to just one activity for Verizon's retail representatives. See McLean/Wierzbicki/Webster Decl. ¶ 44. Specifically, this measurement compares the time it takes Verizon to provide address validation and telephone number reservation for a CLEC to the time it takes Verizon's retail representatives to provide

## 2. Ordering.

Verizon provides CLECs serving end users in New Jersey with the same two electronic ordering interfaces that it provides in its 271-approved States and the rest of the former Bell Atlantic service areas. See McLean/Wierzbicki/Webster Decl. ¶ 53. The first is the same Web GUI that is available for pre-ordering. See id. The second is an EDI ordering interface. See id. Like the pre-ordering EDI interface, the ordering EDI interface is available in two versions: LSOG 4 (which was in place when Verizon's Massachusetts, Connecticut, and Pennsylvania applications were approved) and LSOG 5 (which is based on the latest adopted standards). See id. ¶¶ 54-55. The Commission has found that Verizon's ordering interfaces satisfy the requirements of section 271. See Pennsylvania Order ¶ 12; Massachusetts Order ¶ 70; New York Order ¶ 159; Connecticut Order ¶ 51. At present, there are 16 CLECs in New Jersey using EDI for ordering (plus five additional CLECs certified to use it) and more than 75 CLECs in New Jersey using the Web GUI for ordering. See McLean/Wierzbicki/Webster Decl. ¶ 53.

Verizon's ordering interfaces are handling commercial volumes. In 2000, Verizon processed more than 7.7 million local service requests ("LSRs") across the former Bell Atlantic footprint, and Verizon is on track to process an even greater number of orders this year. See id. ¶ 60. As noted above, while the gateways and systems in New Jersey are the same used throughout the former Bell Atlantic footprint, the Service Order Processor ("SOP") in New Jersey processes only New Jersey orders. See id. ¶¶ 52, 60. In 2000, the New Jersey SOP processed more than 425,000 LSRs. See id. ¶ 60. In the first ten months of this year, the New Jersey SOP processed 413,000 LSRs. See id. Moreover, as part of its OSS test in New Jersey,

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just the telephone number reservation for itself. See id. In contrast, the New York measurement includes both functions in the retail analog. See Guerard/Canny/DeVito Decl. ¶ 40. Once the time to perform the address validation for itself is factored back in, Verizon's performance is at parity. See id.

KPMG also tested Verizon's ability to process normal, peak, and stress order volumes, and it found that Verizon satisfied all of the test criteria. See id.; KPMG NJ Report at 135-141.

Indeed, KPMG's test subjected Verizon's New Jersey SOP to region-wide order volumes, which are much larger than the volumes this SOP can be expected to receive given that it serves only New Jersey. See McLean/Wierzbicki/Webster Decl. ¶ 60.

Even at large and increasing volumes, Verizon performs the various ordering functions on a timely basis. From August through October 2001, Verizon's on-time performance for returning confirmation, reject, and completion notifiers generally exceeded the 95-percent benchmark for both UNE and resale orders, and across almost all order-type subcategories. See id. ¶¶ 75-76.<sup>61</sup> These are the same "strict benchmark standards" that apply to Verizon's performance in Pennsylvania, Massachusetts, and New York. New York Order ¶¶ 164, 180; see Pennsylvania Order ¶ 131; Massachusetts Order ¶ 71. Verizon also processes orders accurately, as evidenced by its performance on the Service Order Accuracy measurements. From August through October, Verizon's order-accuracy performance exceeded 95 percent for all categories of resale and UNE orders, including those requiring manual intervention. See McLean/Wierzbicki/Webster Decl. ¶ 77. These results are even better than what the Commission has approved in the past. See Massachusetts Order ¶ 81 & n.251; Pennsylvania

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<sup>61</sup> There were only a handful of ordering measurements from August through October for which Verizon did not meet the benchmark, and most of these had very low order volumes, see McLean/Wierzbicki/Webster Decl. ¶ 75, which, as the Commission has found, are "not as reliable an indicator of checklist compliance as performance based on larger numbers of observations," Kansas/Oklahoma Order ¶ 36. In addition, some performance results were affected by the mischaracterization of some orders for six lines or more (which have a 72-hour benchmark) in the category for orders with fewer than six lines (which have a 24-hour benchmark). See McLean/Wierzbicki/Webster Decl. ¶ 75. This mischaracterization (which was the result of a malfunction in Verizon's metrics systems that Verizon fixed in October 2001) caused certain orders to be recorded as provided late, even though they were in fact provided on time. See id.

Order ¶ 49 & n.190; see also New York Order ¶¶ 173-174 (recognizing that these measurements understate Verizon's performance).

Verizon's OSS also are capable of "flowing through" a large percentage of CLEC orders. Overall, CLEC orders in New Jersey flow through at comparable rates to what the Commission found acceptable in New York and Massachusetts. See McLean/Wierzbicki/Webster Decl. ¶ 62; Massachusetts Order ¶ 78; New York Order ¶ 166.<sup>62</sup> And for the largest category of orders in New Jersey — resale orders — the flow-through rates in New Jersey are higher than they were in Verizon's 271-approved States at the time applications were filed in those States (and higher than the flow-through rates in those States today). See McLean/Wierzbicki/Webster Decl. ¶ 66. Moreover, as in Verizon's 271-approved States, KPMG has confirmed that properly formatted orders for service types that are designed to flow through will in fact do so. See id. ¶ 69; KPMG NJ Report at 158.

Of course, as the Commission itself has recognized, aggregate flow-through measures are not necessarily "reflective of the actual flow-through capabilities of [Verizon's] systems" for the simple reason that they "are dependent, in part, on the performance of competing carriers to achieve high rates." New York Order ¶ 166. Flow-through and reject rates continue to vary by carrier, with some carriers achieving higher flow-through rates and lower reject rates than others. See McLean/Wierzbicki/Webster Decl. ¶¶ 68-70. As the Commission has recognized, this experience further confirms that the capabilities of Verizon's systems are significantly better

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<sup>62</sup> Verizon's achieved flow-through rate in New Jersey has steadily improved. For example, the achieved flow-through rate for UNE orders increased from 63 percent in August to nearly 87 percent in October. See McLean/Wierzbicki/Webster Decl. ¶ 69. For resale orders, the achieved flow-through rate exceeded 79 percent from August through October; however, these results understate Verizon's performance because a subset of orders that were not capable of flowing through were counted against Verizon. See id. Verizon corrected this scoring error at the end of October, which will be effective with the November results. See id.

than even the aggregate reported results might suggest on their face. See New York Order ¶ 166; Massachusetts Order ¶ 78. Moreover, Verizon has undertaken substantial educational efforts with CLECs to help reduce reject rates and increase flow-through rates. See McLean/Wierzbicki/Webster Decl. ¶¶ 71-72.

Finally, Verizon's performance in returning order status notifiers to CLECs is strong. For example, from August through October 2001, Verizon consistently met the 95-percent benchmark for returning provisioning completion notifiers for resale and UNE orders by noon the next business day. See id. ¶ 86. Verizon's performance also has been strong in returning billing completion notifiers to CLECs. In August and September, Verizon returned billing completion notifiers to CLECs by noon the next business day 99 percent of the time for resale orders and 94.31 percent and 96.41 percent of the time, respectively, for UNE orders. See id. ¶ 87. In October, Verizon's reported results reflect the inclusion of billing completion notifiers for orders processed in previous months; however, for current production orders, Verizon timely returned the billing completion notifiers for 97.40 percent of UNE orders and 99.26 percent of resale orders. See id. ¶¶ 87-89.<sup>63</sup>

### **3. Provisioning.**

Verizon provisions CLEC orders in New Jersey on a nondiscriminatory basis. See McLean/Wierzbicki/Webster Decl. ¶¶ 93-94. As in the other States for which Verizon has

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<sup>63</sup> Verizon also measures the percent of billing completion notices sent within three business days of the order being completed in the SOP. See Guerard/Canny/DeVito Decl. ¶ 59. As the Commission has recognized, however, this measurement is based on the standard billing cycle in New York, which is two days (with some three-day cycles), whereas the standard billing cycle in New Jersey, like that in Pennsylvania, is three days (with some four-day cycles). See McLean/Wierzbicki/Webster Decl. ¶ 90; Pennsylvania Order ¶ 44. When Verizon's performance in New Jersey is calculated using the four-day benchmark, from August through October, it met the 95-percent standard in all three months for UNE orders and in two of those three months for resale orders. See McLean/Wierzbicki/Webster Decl. ¶ 90; Pennsylvania Order ¶ 44 ("Verizon's reliance on the four-day benchmark is reasonable").

received section 271 authorization, there are no separate provisioning interfaces because provisioning is essentially internal to Verizon once an order is submitted. See id. ¶¶ 92, 94. Rather, the systems and processes for most CLEC orders are the same as those used to provision Verizon's retail orders. See id. KPMG tested the processes, procedures, and systems that Verizon uses to provision both retail and wholesale orders, and it found that they were nondiscriminatory in all respects. See id. ¶ 95.

#### **4. Maintenance and Repair.**

Verizon provides CLECs in New Jersey with access to the same two maintenance and repair interfaces that it provides in its 271-approved States and the rest of the former Bell Atlantic service areas: the Web GUI and an electronic bonding interface. See id. ¶ 96. The Web GUI provides "a requesting carrier . . . access [to] all the same functions that are available to [Verizon's] retail representatives." New York Order ¶ 213. The Electronic Bonding Interface ("EBI") is an application-to-application interface that allows CLECs to connect directly to Verizon's maintenance and repair OSS. See McLean/Wierzbicki/Webster Decl. ¶¶ 96, 103. As the Commission previously found, these interfaces "flow directly into Verizon's back-end OSS and enable competing carriers to perform the same functions, in the same manner, as Verizon's retail operations." Massachusetts Order ¶ 95. There currently is one CLEC in New Jersey that has implemented the EBI, and more than 30 CLECs that are using the Web GUI for maintenance and repair. See McLean/Wierzbicki/Webster Decl. ¶ 96.

Competing carriers in New Jersey already use Verizon's maintenance and repair interfaces in commercially significant volumes. For example, from August through October 2001, CLECs used RETAS — the maintenance and repair system accessed by the Web GUI — to perform approximately 135,000 maintenance and repair transactions per month across the

former Bell Atlantic footprint, including approximately 5,300 maintenance transactions per month in New Jersey. See id. ¶ 104.

Verizon's maintenance and repair systems also process trouble reports from CLECs in substantially the same time and manner as Verizon processes reports for its own retail customers. From August through October, Verizon consistently exceeded the established standards for responding to all types of maintenance and repair requests that CLECs submitted using the Web GUI. See id. ¶ 105; see also Massachusetts Order ¶ 96 (relying on comparable or lesser performance); New York Order ¶ 219 (same). Moreover, KPMG evaluated Verizon's maintenance and repair systems, including Verizon's performance, processes, documentation, network surveillance, work center operations and work coordination, and it found them satisfactory in all respects. See McLean/Wierzbicki/Webster Decl. ¶ 107; KPMG NJ Report at 235-302.

## 5. Billing.

Verizon uses the same systems to generate billing information for CLECs in New Jersey that it uses for its own retail customers and for interexchange carriers. See McLean/Wierzbicki/Webster Decl. ¶ 108. These are the same systems that Verizon uses in Pennsylvania, see id., where the Commission found that "Verizon's wholesale billing systems provide competing carriers a meaningful opportunity to compete." Pennsylvania Order ¶ 42.<sup>64</sup>

As the Commission has previously recognized, the billing information that competing carriers use to render bills to their own customers consists of the usage data collected by

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<sup>64</sup> Verizon's billing systems are currently producing more than 600 wholesale bills per month in New Jersey on the Customer Record Information System ("CRIS") (used for billing resale services and unbundled loops) and more than 100 wholesale bills per month on the Carrier Access Billing System ("CABS") (used for billing other UNEs). See McLean/Wierzbicki/Webster Decl. ¶ 112.

Verizon's switches. See, e.g., Pennsylvania Order ¶¶ 13-14. Competing carriers combine this data with information from their own systems in order to bill their customers. See id. In New Jersey, as in Verizon's 271-approved States, Verizon provides competing carriers with both overall usage data and exchange access data. See McLean/Wierzbicki/Webster Decl. ¶ 109. Also, as in those other States, Verizon provides this information on Daily Usage Files, which Verizon will deliver electronically via the Connect:Direct interface or on tape. See id. In the first ten months of 2001, Verizon created more than 200 million call records (i.e., Exchange Message Interface ("EMI") records). See id. ¶ 110. Verizon delivers usage data to CLECs on time. For example, from August through October 2001, Verizon has exceeded the 95-percent on-time standard for providing customer-usage data to CLECs within four business days. See id. ¶ 125.

In addition, Verizon provides carrier bills to CLECs for the services it provides to those carriers. Verizon will provide carrier bills to CLECs either on paper (or CD-ROM) in Verizon end-user formats, or electronically in the Billing Output Specification ("BOS") Bill Data Tape ("BDT") format. See id. ¶ 113. Although the paper bill historically has been the "bill of record" in New Jersey, in August 2001, Verizon made it possible for CLECs to make the electronic BOS-BDT bill their bill of record. See id. ¶ 114. Today, more than 40 CLECs in New Jersey receive the BOS-BDT bill, and through the end of November ten CLECs have elected to make the BOS-BDT bill their bill of record. See id. Moreover, from August through October, Verizon has consistently exceeded the 98-percent on-time standard for providing carrier bills to CLECs within ten business days. See id.; see also New York Order ¶ 227 (relying on comparable performance under this measurement).



As in Pennsylvania, Verizon engaged PricewaterhouseCoopers (“PwC”) to conduct an attestation review of the actual BOS-BDT bills that Verizon provides to CLECs in New Jersey. See id. ¶ 115. PwC has conducted two separate reviews. The first review confirmed that the BOS-BDT bills in New Jersey match the paper bills. See id. ¶ 116. And, given that KPMG previously had confirmed that the paper bills in New Jersey are accurate, PwC’s finding confirms that the BOS-BDT bills are likewise accurate. See Pennsylvania Order ¶ 35 (relying on similar facts). The second PwC review evaluated recent improvements that Verizon has made to its billing systems to address concerns raised during the Pennsylvania 271 proceedings. See McLean/Wierzbicki/Webster Decl. ¶ 117. In particular, PwC verified that the BOS-BDT bills provided to CLECs in New Jersey: (1) included the correct taxes; (2) did not include directory advertising in the form of a carrier-usage charge; and (3) did not contain resale usage charges in UNE platform accounts. See id. Moreover, PwC confirmed that, in September, the amount of manual adjustments that Verizon needed to perform in order to balance the paper bills with the BOS-BDT bills was negligible, representing only 0.72 percent of total charges. See id. Verizon has conducted the same examination of the October bills, and the amount of necessary manual adjustments was only 0.52 percent of the total charges. See id.

Just as PwC’s review of the BOS-BDT bills confirms that these bills are accurate, so does Verizon’s real-world experience with CLECs. CLECs raise issues with their carrier bills in one of two ways: they issue a trouble ticket if they have a problem with the formatting, data, or delivery of a bill; or they submit a claim to Verizon disputing a charge under the procedures set forth in Verizon’s CLEC Handbook. See id. ¶ 118. In New Jersey, from January through October 2001, CLECs submitted 22 fewer trouble tickets in connection with their BOS-BDT than CLECs submitted in Pennsylvania from January through July 2001, even though the number